

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jesse Ventura a/k/a James G. Janos,

Civil No. 12-472 RHK/JJK

Plaintiff,

vs.

Taya Kyle, Executor of the Estate of Chris
Kyle,

Defendant.

**DECLARATION OF CLAIRE H.
OUELLETTE IN SUPPORT OF
DEFENDANT TAYA KYLE'S
MEMORANDUM IN SUPPORT OF
MOTION FOR JUDGMENT AS A
MATTER OF LAW OR A NEW
TRIAL**

I, Claire Ouellette, hereby declare as follows:

1. I am a paralegal at Faegre Baker Daniels LLP, which represents Defendant Taya Kyle, Executor of the Estate of Chris Kyle, in the above-captioned case. I make this Declaration upon personal knowledge and upon review of the firm's files and records in this case.

2. Attached hereto as ***Exhibit 1*** is a true and correct copy of HarperCollins Publishers agreement with Chris Kyle and Scott McEwen, dated 12/20/2012, admitted under trial exhibit number Pltf. 82.

3. Attached hereto as ***Exhibit 2*** is a true and correct copy of Agreement to Prepare Manuscript between Chris Kyle, Scott McEwen and Jim DeFelice, dated 02/17/2011, admitted under trial exhibit number Pltf. 83.

4. Attached hereto as ***Exhibit 3*** is a true and correct copy of Agreement between Chris Kyle and Scott McEwen dated 05/22/2013, with Exhibit A signed by Scott McEwen on 05/23/2012, admitted under trial exhibit number Pltf. 84.

5. Attached hereto as ***Exhibit 4*** is a true and correct copy of Letter of Direction to WME Entertainment relating to payments under four separate agreements, dated 09/27/2012, admitted under trial exhibit number Pltf. 85.

6. Attached hereto as ***Exhibit 5*** is a true and correct copy of HarperCollins Publishers amendment to agreement of 12/20/2010, dated 10/05/2012, admitted under trial exhibit number Pltf. 86.

7. Attached hereto as ***Exhibit 6*** is a true and correct copy of Book royalties statement for six month period ending 06/30/2012, dated, 10/01/2012, bearing trial exhibit number Deft. 215.

8. Attached hereto as ***Exhibit 7*** is a true and correct copy of Book royalties statement for six month period ending 12/31/2012, bearing trial exhibit number Deft. 220.

9. Attached hereto as ***Exhibit 8*** is a true and correct copy of Book royalties statement for six month period ending 06/30/2013, dated 10/01/2013, bearing trial exhibit number Deft. 226.

10. Attached hereto as ***Exhibit 9*** is a true and correct copy of Book royalties statement for six month period ending 12/31/2013, bearing trial exhibit number Deft. 227.

11. Attached hereto as ***Exhibit 10*** is a true and correct copy of Book royalties payment to Chris Kyle, dated 10/22/2012, bearing trial exhibit number Deft. 218.

12. Attached hereto as ***Exhibit 11*** is a true and correct copy of Book royalties payment to CT Legacy LLC, dated 04/12/2013, bearing trial exhibit number Deft. 223.

13. Attached hereto as ***Exhibit 12*** is a true and correct copy of Book royalties payment to CT Legacy LLC, dated 10/08/2013, bearing trial exhibit number Deft. 228.

14. Attached hereto as ***Exhibit 13*** is a true and correct copy of Book royalties payment to CT Legacy LLC, dated 04/04/2014, bearing trial exhibit number Deft. 229.

15. Attached hereto as ***Exhibit 14*** is a true and correct copy of Book royalties payment to Chris Kyle, dated 10/22/2012, admitted under trial exhibit number Pltf. 137.

16. Attached hereto as ***Exhibit 15*** is a true and correct copy of Book royalties payment to CT Legacy LLC, dated 04/12/2013, admitted under trial exhibit number Pltf. 193.

17. Attached hereto as ***Exhibit 16*** is a true and correct copy of Book royalties payment to CT Legacy LLC, dated 10/08/2013, admitted under trial exhibit number Pltf. 353.

18. Attached hereto as ***Exhibit 17*** is a true and correct copy of Book royalties payment to CT Legacy LLC, dated 04/04/2014, admitted under trial exhibit number Pltf. 354.

19. Attached hereto as ***Exhibit 18*** is a true and correct copy of income tax payment to U.S. Treasury, dated 04/10/2013, bearing trial exhibit number 222.

20. Attached hereto as ***Exhibit 19*** is a true and correct copy of income tax payment to U.S. Treasury, dated 09/10/2013, bearing trial exhibit number 225.

21. Attached hereto as ***Exhibit 20*** is a true and correct copy of income tax payment to U.S. Treasury, dated 01/16/2014, bearing trial exhibit number 239.

22. Attached hereto as ***Exhibit 21*** is a true and correct copy of Ventura's 2002 Tax Returns, admitted under trial exhibit number Deft. 166.

23. Attached hereto as ***Exhibit 22*** is a true and correct copy of Ventura's 2003 Tax Returns, admitted under trial exhibit number Deft. 167.

24. Attached hereto as ***Exhibit 23*** is a true and correct copy of Ventura's 2004 Tax Returns, admitted under trial exhibit number Deft. 168.

25. Attached hereto as ***Exhibit 24*** is a true and correct copy of Ventura's 2005 Tax Returns, admitted under trial exhibit number Deft. 169.

26. Attached hereto as ***Exhibit 25*** is a true and correct copy of Ventura's 2006 Tax Returns, admitted under trial exhibit number Deft. 170.

27. Attached hereto as ***Exhibit 26*** is a true and correct copy of Ventura's 2007 Tax Returns, admitted under trial exhibit number Deft. 171.

28. Attached hereto as ***Exhibit 27*** is a true and correct copy of Ventura's 2008 Tax Returns, admitted under trial exhibit number Deft. 172.

29. Attached hereto as ***Exhibit 28*** is a true and correct copy of Ventura's 2009 Tax Returns, admitted under trial exhibit number Deft. 173.

30. Attached hereto as ***Exhibit 29*** is a true and correct copy of Ventura's 2010 Tax Returns, admitted under trial exhibit number Deft. 174.

31. Attached hereto as ***Exhibit 30*** is a true and correct copy of Ventura's 2011 Tax Returns, admitted under trial exhibit number Deft. 175.

32. Attached hereto as ***Exhibit 31*** is a true and correct copy of Ventura's 2012 Tax Returns, admitted under trial exhibit number Deft. 176.

33. Attached hereto as ***Exhibit 32*** is a true and correct copy of the demonstrative exhibit summarizing Ventura's income and charitable contributions, as shown to the jury during Defendant's closing argument.

34. Attached hereto as ***Exhibit 33*** is a true and correct copy of an audio file of the WCCO Chad Hartman Show (Aug. 5, 2014, 12:00 PM),
http://minnesota.cbslocal.com/?podcast_url=http%3A%2F%2Fwww.podtrac.com%2Fpts%2Fredirect.mp3%2Fnyc.podcast.play.it%2Fmedia%2Fd0%2Fd0%2Fd1%2Fd5%2FdV%2FdU%2Fd9%2F15VU9_3.MP3%3Fauth%3D5562475323607942593_dJOFKJOZeIGXCtXv1uVXtB6Wj8&podcast_name=8-5-14+Chad+Hartman+Show+12p%3A+Former+Gov.+Jesse+Ventura&podcast_artist=Chad+Hartman&station_id=82&tag=pages&dcid=CBS.MINN (last visited Aug. 6, 2014).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 4, 2014

/s/ Claire H. Ouellette

Claire H. Ouellette